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Attorneys for Defendant  
WELLS FARGO BANK, N.A.

**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**  
**PORTLAND DIVISION**

DUKE TRAN,

Plaintiff,

v.

WELLS FARGO BANK, N.A.,

Defendant.

**Case No.: 3:15-CV-00979-BR**

**DECLARATION OF LEAH C. LIVELY IN  
SUPPORT OF UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO  
RESPOND TO AMENDED COMPLAINT**

I, Leah C. Lively, declare as follows:

1. I am one of the attorneys of record for defendant Wells Fargo Bank, N.A. in the above-captioned matter. I have personal knowledge of the facts set forth herein, or know of them by my review of documents maintained in the regular course of business by Ogletree

Deakins, and make this declaration in support of defendant's Unopposed Motion for Extension of Time to Respond to Amended Complaint.

2. I conferred with plaintiff's counsel, and was advised that plaintiff does not oppose this motion.

3. The additional time sought in defendant's accompanying motion is needed so that defendant may conclude its initial investigation in order to meaningfully respond to plaintiff's Amended Complaint.

4. This motion is made in good faith and not for the purposes of delay.

Pursuant to 28 U.S.C. § 1746 and the laws of the United States of America, I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 12, 2016.

By: s/ Leah C. Lively  
Leah C. Lively, OSB No. 962414  
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Attorneys for Defendant  
WELLS FARGO BANK, N.A.

**CERTIFICATE OF SERVICE**

I hereby certify that I caused to be served a true and correct copy of the **Declaration of Leah C. Lively in Support of Unopposed Motion for Extension of Time to Respond to Amended Complaint** to be served upon the individuals listed below on this 12th day of July, 2016, via the Court's CM/ECF System to:

Michael Fuller, OSB #09357  
Eric Olsen, OSB #783261  
David Johnson, OSB #123553  
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Attorneys for Plaintiff United States of America

DATED this 12th day of July, 2016.

s/ Rosealynn Seitz  
Rosealynn Seitz, Practice Assistant  
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